

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

GEORGE A. JACKSON, et al.,)	
)	
Plaintiffs,)	
)	
v.)	C. A. No. 05-823-KAJ
)	
STANLEY TAYLOR, et al.,)	JURY TRIAL REQUESTED
)	
Defendants.)	

**DEFENDANTS MICHAEL KNIGHT AND CHRIS SENATO’S MOTION FOR
ENLARGEMENT OF TIME OUT OF TIME PURSUANT
TO FED. R. CIV. P. 6(b)(2) TO RESPOND TO PLAINTIFFS’
REQUESTS FOR PRODUCTION OF DOCUMENTS**

1. The Plaintiffs are inmates incarcerated and under the supervision of the Delaware Department of Correction (“DOC”) mainly housed at the Sussex Correctional Institution (“SCI”) in Georgetown, Delaware but also at the Delaware Correctional Center and the Morris Community Corrections Institution.

2. On or about December 1, 2005, the inmate Plaintiffs under the direction of Plaintiff George Jackson, (“Jackson”) commenced this action by filing a Complaint pursuant to 42 U.S.C. §1983 with leave to proceed *in forma pauperis* alleging Eighth and Fourteenth Amendment Due Process violations against the following defendants: Stan Taylor, Joyce Talley and Carl Anson. (D.I. 2). On or about October 10, 2006, Jackson filed a Motion to Amend the Complaint to add the following DOC Defendants: Michael Knight, Chris Senato, Bethany Evans, Debbie Melvin, Richard Crockett, Richard Manuel, Wentson White and Steven Rayner. (D.I. 117).

3. Jackson has filed several discovery requests to which the Defendants have timely responded. On or about October 18, 2007, Jackson filed a *Request for Production of Documents* directed to Defendants Michael Knight and Chris Senato. (D.I. 217).

4. Due to the press of other litigation counsel was not able to file Defendants' Responses to the *Production of Documents Request* in a timely manner. In order to properly respond to Jackson's request, counsel for State Defendants requested additional information from SCI's maintenance personnel. Counsel has just received the necessary documentation from the SCI maintenance department. Counsel therefore, requests an enlargement of ten (10) days from the November 18, 2007, deadline for filing a response until today, November 28, 2007.

5. This is Defendants' first request for an extension of time for filing a Response to Jackson's *Production of Documents Request*.

6. There is no trial date scheduled in this case.

7. A form of order is attached to this motion that will grant the Defendants a ten (10) day extension from the November 18, 2007, deadline until today, November 28, 2007, in which to file Defendants' response.

WHEREFORE, the Defendants respectfully request that this Honorable Court grant their Motion and enter an Order, substantially in the form attached hereto, enlarging Defendants' time until today, November 28, 2007, in which to file a Response to Plaintiff's *Production of Documents Request*.

DEPARTMENT OF JUSTICE
STATE OF DELAWARE

/s/ Catherine Damavandi
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Attorney for Defendants

Dated: November 28, 2007

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7.1.1 CERTIFICATION OF COUNSEL

The counsel for the Defendants, Deputy Attorney General Catherine Damavandi, files this certification in compliance with Rule 7.1.1 of the Local Rules of Civil Procedure and certifies that:

1. Plaintiffs are inmates incarcerated in the Delaware Correctional system, at the Sussex Correctional Institution and the Delaware Correctional Center.
2. Since the Plaintiffs are not able to be reached by telephone counsel for the Defendants has spent no time in attempting to reach an agreement on the subject of the motion for enlargement of time.
3. She assumes the motion is opposed.

DEPARTMENT OF JUSTICE
STATE OF DELAWARE

/s/ Catherine Damavandi
Catherine Damavandi, ID #3823
Deputy Attorney General
820 N. French St. 6th Fl.,
Wilmington, De 19801
(302)577-8400
Attorney for Defendants

Dated: November 28, 2007

CERTIFICATE OF SERVICE

I hereby certify that on November 28, 2007, I electronically filed the attached *Defendants Michael Knight and Chris Senato's Enlargement of Time Out of Time To Respond to Plaintiffs' Request for Production of Documents* with the Clerk of Court using CM/ECF. I hereby certify that on November 28, 2007, I have mailed by United States Postal Service, the document to the non-registered parties on the attached list.

STATE OF DELAWARE
DEPARTMENT OF JUSTICE

/s/ Catherine Damavandi
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